

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195 (SHS) (OTW)

NOTICE OF OBJECTION TO DISCOVERY ORDER AT ECF 344

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Elana Nightingale Dawson and exhibits annexed thereto, and all pleadings and proceedings referenced therein, Defendant OpenAI OpCo, L.L.C. (“OpenAI”) moves this Court, before the Honorable Sidney H. Stein in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 72(a) setting aside the discovery order at ECF 344 and directing Plaintiff The New York Times Company to produce the discovery requested herein, and any such other further relief as this Court may deem just and proper.

Dated: December 6, 2024

Respectfully submitted,

By: /s/ Elana Nightingale-Dawson

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* All parties whose electronic signatures are included herein have consented to the filing of this document in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

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